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November 15, 2013

VIA ECF

The Honorable Claire C. Cecchi, U.S.D.J.
The Rev. Dr. Martin Luther King, Jr., Federal Building and Courthouse
Federal Square
Newark, New Jersey 07101

Re: In re Insurance Brokerage Antitrust Litigation (MDL 1663),
Civil Action Number 04-5184 (CCC/JAD)

This Letter Applies to:

Lincoln Adventures, LLC et al. v. Those Certain Underwriters, et al.,

Dear Judge Cecchi:

We are Defendants' Liaison counsel in this matter and we write to advise Your Honor that the parties have resolved their concerns about the briefing schedule for the Plaintiffs' pending Motion to Amend. Specifically, should it meet with Your Honor's approval, the Defendants opposition will be filed on **Friday, December 6, 2013**. Plaintiffs' reply will be filed on **Friday, December 20, 2013**.¹ The Defendants, with the consent of the Plaintiffs, ask that if Your Honor is agreeable to this schedule Your Honor "so order" this letter.

¹ Defendants have also stated that should the coming holidays make this date unworkable for the Plaintiffs, Defendants will consent to a reasonable extension request made to Your Honor.

The Honorable Claire C. Cecchi, U.S.D.J.
November 15, 2013
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Further, the Defendants have agreed that they will consent to Plaintiffs' request for up to ten additional pages (in Times New Roman 14 point) for the reply brief. By this letter, the parties request that if Your Honor is agreeable to this short page extension it be so ordered.

Finally, the parties' joint agreement to these dates is premised upon the joint understanding and request that Your Honor not re-schedule the Status Conference, which is currently being held without date, until after the Defendants' opposition papers to the Motion to Amend are filed on December 6, 2013, (though if Your Honor wishes to have the status conference on December 6, Defendants will submit their opposition papers on December 5, 2013). The parties jointly believe that having both the moving and opposition papers on file prior to the conference would be beneficial.

Should Your Honor have any questions or desire anything additional, we will be available at Your Honor's convenience.

Respectfully submitted,

s/

Liza M. Walsh

cc: All Counsel of Record (via ECF and Email Service List)